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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of Pacific Gas and Electric Company for Adoption of Electric Revenue Requirements and Rates Associated with its 2023 Energy Resource Recovery Account (ERRA) and Generation Non-Bypassable Charges Forecast and Greenhouse Gas Forecast Revenue Return and Reconciliation (U 39 E)	Application 22-05-_____

**APPLICATION OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)
FOR 2023 ENERGY RESOURCE RECOVERY ACCOUNT AND
GENERATION NON-BYPASSABLE CHARGES FORECAST AND
GREENHOUSE GAS FORECAST REVENUE RETURN AND RECONCILIATION**

REQUEST FOR EXPEDITED SCHEDULE (RULE 2.9)

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Dated: May 31, 2022

TABLE OF CONTENTS

Page

TABLE OF CONTENTS
(continued)

TABLE OF ACRONYMS

Acronym	Full Name
A.	Application
AB	Assembly Bill
AET	Annual Electric True-up
ARB	California Air Resources Board
BioMAT	Bioenergy Market Adjusting Tariff
BPP	Bundled Procurement Plan
CalPA	Public Advocates Office
CAM	Cost Allocation Mechanism
CCAs	Community Choice Aggregation
CHP	Combined Heat and Power
CPUC	California Public Utilities Commission
CSGT	Community Solar Green Tariff
CTC	Competition Transition Charge
D.	Decision
DA	Direct Access
DAC-GT	Disadvantaged Communities Green Tariff
DAC-SASH	Disadvantaged Communities Single-Family Affordable Solar Housing
DWR	Department of Water Resources
ESP	Electric Service Provider
ERRA	Energy Resource Recovery Account
GHG	Greenhouse gas
GTSR	Green Tariff Shared Renewables

Acronym	Full Name
IOU	Investor-owned Utility
MTCBA	Modified Transition Cost Balancing Account
NBC	Non-bypassable Charge
NSGBA	New System Generation Rate Balancing Account
NSGC	New System Generation Charge
PABA	Portfolio Allocation Balancing Account
PCIA	Power Charge Indifference Adjustment
PFS	PCIA Financing Subaccount
PG&E	Pacific Gas and Electric Company
PPCBA	Public Policy Charge Balancing Account
PPCP	Public Policy Charge Procurement
PPP	Public Purpose Program
PUBA	Power Charge Indifference Amount Undercollection Balancing Account
PURPA	Public Utilities Regulatory Policy Act
QF	Qualifying Facility
R.	Rulemaking
RA	Resource Adequacy
RECs	Renewable Energy Credits
RPS	Renewables Portfolio Standard
RTBA	Risk Transfer Balancing Account
RUBA	Residential Uncollectables Balancing Account
SOMAH	Solar on Multifamily Affordable Housing
TM	Tree Mortality
TM NBC	Tree Mortality Non-bypassable Charge

Acronym	Full Name
TMNBCBA	Tree Mortality Non-bypassable Charge Balancing Account
UGBA	Utility Generation Balancing Account
UOG	Utility Owned Generation
VAMO	Voluntary Allocation Market Offer
VAMOMA	Voluntary Allocation Market Offer Memorandum Account

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I. INTRODUCTION

Pursuant to Rules 2.1, 2.9, and 3.2 of the Rules of Practice and Procedure of the California Public Utilities Commission ("Commission" or "CPUC"), as well as Public Utilities Code Section 454.5(d)(3)[1/] and related Commission decisions, Pacific Gas and Electric Company ("PG&E") submits this 2023 Energy Resource Recovery Account ("ERRA") and Generation Non-Bypassable Charges Forecast and Greenhouse Gas Forecast Revenue Return and Reconciliation Application ("Application"). Commission Decision ("D.") 22-01-023 modified the due date for PG&E to file this annual Application to May 15.[2/] On April 27, 2022, the Commission's Executive Director granted PG&E an extension to May 31, 2022 to file this Application.[3]. Accordingly, PG&E's Application is timely.

1/ All statutory references in this Application are to the Public Utilities Code unless otherwise noted.

2/ D. 22-01-023, p. 28, Ordering Paragraph ("OP") 3.

3/ PG&E's Application remediates an error that PG&E discovered pertaining to its 2023 system and bundled energy and peak sales forecasts during the course of finalizing PG&E's Application

PG&E's Application requests that the Commission approve: (1) PG&E's forecasted 2023 energy procurement revenue requirements to become effective in rates on January 1, 2023, including (a) disposition of PG&E's forecast December 31, 2022 year-end balancing account balances; (b) disposition of recorded Voluntary Allocation Market Offer Memorandum Account ("VAMOMA") balances; and (c) approval of PG&E's methodology to include 2021 and 2022 renewable energy credits ("RECs") toward the 2023 Power Charge Indifference Adjustment ("PCIA") revenue requirement calculation and to allocate the value of 2021 and 2022 RECs to benefit bundled and departing load customers responsible for applicable Portfolio Allocation Balancing Account ("PABA") vintage costs; (2) PG&E's proposed forecasted electric sales for 2023; (3) PG&E's forecast of greenhouse gas ("GHG") revenues, revenue return, and administrative, programmatic, and customer outreach costs for 2023; (4) PG&E's 2021 GHG administrative and customer outreach costs as reasonable; and (5) PG&E's rate design proposals associated with its proposed total electric procurement revenue requirements to be effective in rates on January 1, 2023, including Green Tariff Shared Renewables ("GTSR") rates. A summary of these requests is included below.

These forecasts described herein are illustrative, and PG&E will update associated revenue requirements and its rate proposal as necessary through the course of this proceeding, including its Update to Prepared Testimony, which PG&E anticipates to serve to parties on October 24, 2022 ("Fall Update").[4/] PG&E's Fall Update will reflect the latest market conditions, which may be higher or lower priced than today, and will also reflect the latest

requests. In this Application and Prepared Testimony, PG&E remediates the error through revisions to sales forecasts, forecast revenue requirements, and forecasted 2023 rates that were impacted by such late-discovered errors.

4/ In D. 22-01-023, the Commission adopted ERRA Forecast-related changes, including an order that the Commission's Energy Division release Market Price Benchmarks ("MPBs") for the purposes of Power Charge Indifference Adjustment ratesetting in October rather than November. D. 22-01-023, p. 27, OP 1.

balancing account balances.[5/] As a result, the initial 2023 rates and rate changes described in this Application may end up higher or lower than presented in the Fall Update.

As a result of the preliminary revenue requirements presented in this Application, PG&E preliminarily forecasts that in 2023 the system average bundled service customer rate will decrease by 7.2 percent, the system average Direct Access ("DA") and Community Choice Aggregation ("CCA") rate will decrease by 3.6 percent, and the departing load rate will decrease by 4.7 percent. While PG&E currently estimates a rate decrease due to the revenue requirements presented in this Application, PG&E's estimates are subject to change during the course of this proceeding. In PG&E's Fall Update, PG&E's revenue requirement requests for 2023 could result in a total revenue request increase or, alternatively, can result a change in the amount of the estimated revenue requirement decrease compared to PG&E's Application.

First, PG&E requests that the Commission adopt its 2023 ERRA forecast revenue requirements, less certain costs related to Utility Owned Generation ("UOG") set forth in PG&E's 2020 General Rate Case ("GRC") D. 20-12-005 or approved or considered in other regulatory proceedings (collectively, the "UOG-Related Costs"), and those amounts related to capped 2020 departing load PCIA rates that were addressed by D. 20-12-038 as indicated in the table below.[6/] PG&E's 2023 forecast revenue requirements include (a) disposition of PG&E's forecast December 31, 2022 year-end balancing account balances; (b) disposition of recorded VAMOMA balances; and (c) PG&E's methodology to include 2021 and 2022 RECs toward the

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5/ Pursuant to OP 5 of D. 06-12-018, PG&E is required to "[u]se price quotes for natural gas and electricity taken from a single day that is the median price day during the week that is 45 days prior to the ERRA update." PG&E's Fall Update will reflect the actual market prices that PG&E incurs to serve its bundled customers this summer as well as an updated forecast of 2023 market prices based on Commission's Order. Market volatility has the potential to swing PG&E's updated revenue requirement and resulting rate request that will be presented in PG&E's Fall Update upward or downward.

6/ Pursuant to the procedural schedule adopted in PG&E's 2023 GRC proceeding (A. 21-06-021) PG&E does not anticipate a Final Decision concerning a test year 2023 GRC revenue requirement during the course of this Application. Accordingly, revenue requirements derived from D. 20-12-038 plus attrition are utilized herein.

2023 PCIA revenue requirement calculation and to allocate the value of such excess pre 2023 RECs to benefit customers responsible for applicable PABA vintage costs. PG&E's 2023 ERRA forecast revenue requirements are initially forecast below and as may be updated through the course of this proceding, including PG&E's Fall Update which will include updates reflecting final Commission Decisions in effect at such time:

	2023 Revenue Requirement	**Amount (in thousands)**
1	CAM/NSGC	$155,432
2	VAMOMA	90
3	PCIA	1,037,672
4	Ongoing CTC	13,927
5	ERRA-Main	3,227,431
6	ERRA-PFS	(80,025)
7	PUBA	93,402
8	PPCP	(6,660)
9	TMNBC	26,445
10	BioMAT	18,636
11	Total Revenue Requirement for Rate-setting	$4,486,350
12	Adjustments for Revenue Requirements Authorized in Other Proceedings	
13	UOG-Related Costs	$(2,372,970)
14	ERRA – PFS	80,025
15	2020 PUBA	(93,402)
16	RTBA-E	(143,833)

	2023 Revenue Requirement	Amount (in thousands)
17	RUBA-E	(3,721)
18	Total Adjustments	($2,533,902)
19	**PG&E's Revenue Requirement Request in this Application**	$1,952,448

The 2023 ERRA forecast revenue requirement required for ratesetting is $4,486 million and includes $2,373 million of UOG-Related Costs and amounts related to capped 2020 departing load PCIA rates addressed in D. 20-12-038. Inclusion of UOG-Related Costs and those certain amounts addressed in D. 20-12-038 in the identified revenue requirement components described above are included herein solely for rate-setting purposes.[7/] The total 2023 ERRA forecast revenue requirements PG&E is requesting in this Application is $1,952 million, which includes the forecasted year-end balancing account balances.

PG&E will update its revenue requirements, forecasted end-of-year balancing account balances, balance transfer requests, and rate proposals in its Fall Update to reflect updated market conditions and incremental transactions and charges relevant to PG&E's requests, Commission orders, and the final outcome of applicable Commission proceedings. PG&E's Fall Update will also include updates to reflect updated PCIA benchmarks for rate forecasting and true-up purposes relevant to the ERRA, PCIA, and PABA revenue requirements.

Second, PG&E requests that the Commission adopt PG&E's 2023 electric sales forecast. PG&E also expects updates to its 2023 electric sales forecast to reflect relevant updated data in its Fall Update.

7/ Amounts associated with D. 20-12-038 are (1) the 2020 PUBA revenue requirement; and (2)the ERRA- PCIA Financing Subaccount (PFS). D. 20-12-038, Conclusion of Law ("COL") 9 approved PG&E's "methodology to refund the entire 2020 PUBA balance and projected 2021 PUBA balance to bundled service customers through generation rates" (i.e., the ERRA-PFS revenue requirement in the above table) and to "recover such amounts through a vintage-specific 2021-2023 PUBA rate adder on top of PCIA rates" (i.e., the 2020 PUBA revenue requirement in the above table).✈

Third, PG&E requests that the Commission adopt the following GHG-related forecasts for 2023:

	2023 GHG-Related Forecasts and Administrative, Program, and Outreach Expenses	**Amount**
1.	GHG Administrative and Outreach Expenses	$737,000
2.	Customer Generation Programs	$64.4 million
3.	Net GHG revenue return	$536.7 million
4.	Semi-annual Residential California Climate Credit	$42.58

PG&E also updates GHG-related forecasts in its Update to Prepared Testimony.

Fourth, PG&E requests that the Commission find the 2021 recorded administrative and outreach expenses related to the 2021 GHG revenue return of $560,000 were reasonable.

Fifth, PG&E requests that the Commission approve PG&E's rate proposals associated with its proposed electric procurement-related revenue requirements, including its GTSR rate proposal, to be effective in rates on January 1, 2023.

II. LEGAL AND REGULATORY BACKGROUND

A. ERRA

Section 454.5(d)(3) requires the Commission to:

> Ensure timely recovery of prospective procurement costs incurred pursuant to an approved procurement plan. The commission shall establish rates based on forecasts of procurement costs adopted by the commission, actual procurement costs incurred, or combination thereof, as determined by the commission. The commission shall establish power procurement balancing accounts to track the differences between recorded revenues and costs incurred pursuant to an approved procurement plan. The commission shall review the power procurement balancing accounts, not less than semiannually, and shall adjust rates or order refunds, as necessary, to promptly amortize a balancing account, according to a schedule determined by the commission. Until January 1, 2006, the commission shall ensure

> that any overcollection or undercollection in the power procurement balancing account does not exceed 5 percent of the electrical corporation's actual recorded generation revenues for the prior calendar year excluding revenues collected for the Department of Water Resources. The commission shall determine the schedule for amortizing the overcollection or undercollection in the balancing account to ensure that the 5 percent threshold is not exceeded. After January 1, 2006, this adjustment shall occur when deemed appropriate by the commission consistent with the objectives of this section.

In D. 02-10-062, as modified by subsequent decisions, the Commission implemented this provision by ordering PG&E and California's other investor-owned utilities ("IOUs") to establish procurement-related balancing accounts, to be referred to as the Energy Resource Recovery Account.[8] These Commission decisions also established the regulatory framework for the utilities' annual ERRA forecast filings and expedited "trigger" applications. As described herein, certain components of the regulatory framework relevant to this Application were recently modified in Rulemaking (R.) 17-06-026 by Decision 22-01-023.

The ERRA regulatory process includes two annual proceedings. The first, which PG&E files in February of each year, is an annual compliance proceeding to review the utility's compliance in the preceding year regarding energy resource contract administration, least-cost dispatch, fuel procurement, and the ERRA balancing account. PG&E filed its 2021 ERRA Compliance Application on February 28, 2022 (A.22-02-014).

The second ERRA application, which PG&E is to file by no later than May 15 each year pursuant to D. 22-01-023, is an annual forecast proceeding to adopt a forecast of PG&E's electric procurement cost revenue requirement and electricity sales for the coming year for rate-setting purposes.[9/] PG&E's last ERRA Forecast proceeding, for forecast year 2022, was A. 21-06-001, which was concluded by D. 22-02-002.

In addition to the ERRA forecast and ERRA compliance proceedings, the Commission has also established an ERRA "trigger" mechanism to comply with the Section 454.5(d)(3)

8/ D. 02-10-062,t pp. 59-64.✈

9/ D. 22-01-023, p. 28, OP 3.✈

requirement that "any overcollection or undercollection in the power procurement balancing account does not exceed 5 percent of the electrical corporation's actual recorded generation revenues for the prior calendar year excluding revenues collected for the Department of Water Resources."[10/] In D. 04-01-050 the Commission ordered that an advice letter should be filed annually to calculate the threshold amount, with such filings to be made by April 1 of each year.[11] PG&E's 2022 threshold amount (5 percent of PG&E's total generation revenues) is $278.3 million, as established via Tier 1 Advice 6502-E.

In D. 08-08-011, the Commission provided PG&E authority to file an advice letter "when ERRA balances exceed the trigger, but no change in rates is required because the ERRA balances is forecast to self-correct to an amount under the trigger amount within 120 days.[12/] Relatedly, in D. 22-01-023, the Commission modified ERRA trigger mechanism for an IOU to consider "ERRA account balances net of PABA balances when calculating whether over-collections or under-collections are above the [applicable] four percent trigger point and five percent threshold" … .[13/] On May 16, 2022, consistent with D. 08-08-011 and D. 22-01-023, with PG&E filed Advice 6596-E to inform the Commission that the 2022 ERRA balance, net of PABA balances, exceeded the threshold amount, but the combined bundled customer balances are forecasted to self-correct below the trigger point within 120 days of filing. Accordingly, based on forecasts at the time of filing Advice 6596-E, PG&E does not seek a change in bundled customer rates within 2022 to address the disposition of 2022 ERRA balances outside of this Application.

In D. 22-01-023, the Commission also adopted a going-forward methodology for IOUs to dispose of year-end ERRA balances. Specifically, the Commission authorized tariff

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10/ Pub. Util. Code § 454.5(d)(3); See D. 02-10-062, pp. 64-66; See also D. 15-05-008 (extending ERRA trigger mechanism).

11/ D. 04-01-050, pp. 175-177.

12/ D. 08-08-011, p. 7, OP 3.

13/ D. 22-01-023, p. 27, COL 10.

modifications to "clarify that disposition of the year-end balance in the ERRA account shall be to the PABA upon submission … or approval … by the Commission of the applicable compliance advice letter addressing such balance."[14/] On February 15, 2022 PG&E filed Advice 6515-E, modifying PG&E's tariffs to transfer any under- or overcollected ERRA balances to the most recent PABA vintage upon approval by the Commission of PG&E's ERRA Forecast Application revenue requirements. On March 25, the Energy Division issued a disposition letter approving Advice 6515-E, alleviating the need for PG&E to make a specific request annually for disposing of the year-end ERRA balance to specific groups of customers.

Also relevant to the this Application and the AB 57 ERRA framework codified in Section 454.5 is PG&E's Bundled Procurement Plan ("BPP"). In D. 15-10-031, the Commission approved with modifications PG&E's 2014 BPP. PG&E filed its conformed 2014 BPP with the Commission in Advice 4750-E. On June 15, 2016, the Energy Division issued a disposition letter approving Advice 4750-E.

Moreover, in D. 18-10-019, the Commission approved modifications to PG&E's ERRA "balancing account, and other balancing accounts, as necessary, to be consistent with the [establishment of a] PABA vintaged subaccount structure adopted in [that] decision."[15]

B. PABA

Above-market costs of all generation resources that are eligible for cost recovery through PCIA rates are recorded in the PABA. Specifically, the PABA contains "subaccounts for each vintaged portfolio to account for billed revenues, generation resource costs, net California Independent System Operator market revenues associated with energy and ancillary services, and revenues associated with" renewable energy and resource adequacy capacity.[16/] D. 19-10-001 authorized any over- or under collection in the PABA vintage subaccounts in a given year to be

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14/ D. 22-01-023, p. 28, OP 4.

15/ D. 18-10-019, p. 161, OP 8.

16/ D. 18-10-019, p. 161, OP 7.

rolled into the next year's ERRA Forecast filing.[17] PG&E filed to establish the PABA and update the ERRA, Modified Transition Cost Balancing Account ("MTCBA"), and UGBA by Advice 5440-E. On May 3, 2019, the Energy Division issued a disposition letter approving Advice 5440-E as of January 1, 2019.

C. PUBA

In D. 18-10-019, the Commission adopted a cap, beginning in forecast year 2020, that limited the change of the PCIA rate to 0.5 cents/kWh from one year to the next. The elimination of the PCIA cap was subsequently reconsidered in R. 17-06-026, and D. 21-05-030 removed the cap-and-trigger mechanisms described herein.

Advice 5624-E established the PCIA Under-Collection Balancing Account ("PUBA").[18] PUBA is an interest-bearing account used if the PCIA cap was reached, and tracked obligations that accrue for departing load customers by vintage subaccounts. Under the previous framework, a trigger threshold was set at 10 percent of the forecast PCIA revenues. If the PUBA under-collection reached 7 percent and PG&E forecasted that the balance will reach 10 percent, then PG&E was required to file an expedited application to change the PCIA rates. [19]

In September 2020, PG&E filed expedited A. 20-09-014, seeking to address a PUBA undercollection through adjustments to unbundled and bundled customer rates. A. 20-09-014 was consolidated with A. 20-07-002, addressing PG&E's 2021 ERRA forecast proceeding, and D. 20-12-038 addressed the disposition of the 2020 PUBA balance. Specifically, the Decision approved "PG&E's modified proposal and methodology to refund the entire 2020 PUBA balance and projected 2021 PUBA balance to bundled service customers through generation rates and [to] recover such amounts through a vintage-specific 2021- 2023 PUBA rate adders on top of PCIA rates."[20]

17/ D. 19-10-001, p. 56, OP 3(f).

18/ Advice 5624-E was approved on December 4, 2019.

19/ D. 18-10-019, pp. 162-163, OP 10.

20/ D. 20-12-038, p. 37, COL 9.

D. Additional Components of PG&E's Revenue Requirement and Rate Requests

Several new features related to electric generation procurement have been added to PG&E's Application this this year, and in recent years. In this section, PG&E provides the legal and regulatory background concerning certain Commission-directed procurement and other Commission orders impactful to the optimization of PG&E's PCIA-eligible portfolio that apply to PG&E's revenue requirement and ratemaking requests in this Application.

1. Procurement Programs

In January 2015, the Commission approved PG&E's Solar Choice Programs (*i.e.,* the Green Tariff Shared Renewables or "GTSR" Programs) in D. 15-01-051, and the program was officially launched in 2016. In 2021, the Commission issued D. 21-12-036, resolving multiple Petitions for Modification concerning PG&E's Green Tariff Shared Renewables Program impactful to this Application. D. 21-12-036 approved PG&E's use of an interim pool of eligible renewable resources to serve GTSR customers in 2023 as well as refinements to the ratemaking methodology so that GTSR ratemaking comports with recent reforms to the PCIA.[21/] The program is described in more detail in Chapter 15 of PG&E's Prepared Testimony, which presents the 2023 rate proposal for the Green Tariff Shared Renewables Program.

Pursuant to D. 18-12-003, PG&E filed Advice Letter 5478-E requesting approval to establish the Tree Mortality Non-Bypassable Charge Balancing Account ("TMNBCBA") to record the tree mortality related procurement costs incurred as directed by Resolution E-4770 and Resolution E-4805. As noted in D. 18-12-003, Ordering Paragraph ("OP") 9, the TMNBC cost will be recovered through a PPP charge. PG&E presents its TMNBC revenue requirement in Chapter 13.

In D. 20-08-043, the Commission adopted certain updates to the Bioenergy Market Adjusting Tariff ("BioMAT") contract. In that Decision, the Commission also modified cost

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21/ D. 21-12-036, pp. 51-52, COL 13 and 14 (adopting revisions to GTSR ratemaking); Ordering Paragraph 1 (authorizing PG&E to borrow capacity and energy from its existing renewables portfolio to serve GTSR customers on an interim basis).

recovery for BioMAT procurement from the PCIA charge to the PPP charge to ensure all benefitting customers in the service territory share the costs of the program, rather than continuing the existing vintaged PCIA mechanism.[22/] PG&E submitted Advice 5966-E to establish its BioMAT NBC rate design and plan for implementing the BioMAT. PG&E includes a forecast of the BioMAT NBC revenue requirement in Chapter 14 and rate design in Chapter 22.

In 2020, the Commission established a non-vintaged subaccount of PABA to recover the costs of the new Public Utilities Regulatory Policy Act ("PURPA") standard offer contract in R.18-07-017.[23/] In D. 22-02-002, resolving PG&E's 2022 ERRA Forecast Application, the Commission ordered tariff modifications necessary for PG&E to recover the costs of new PURPA contracts through the Public Policy Charge Balancing Account on a going-forward basis. The Commission ordered that PG&E "retire the non-vintage Power Charge Indifference Adjustment subaccount, transfer the balance to a newly created subaccount in the Public Policy Charge Balancing Account, and file a Tier 1 Advice Letter within 30 days of this Decision to establish a new subaccount in the Public Policy Charge Balancing Account to recover any current or future public policy costs associated with the new Public Utility Regulatory Policies Act contracts."[24] On March 14, 2022, PG&E filed Advice 6524-E seeking tariff revisions to comply with the Commission's Order. On April 15, 2022 the Energy Division issued a disposition letter approving Advice 6524-E. In this Application, new PURPA contracts are addressed in Chapter 6 and Chapter 11, and the net cost of such contracts are recovered through PG&E's PPP requests.

In D. 19-11-016, the Commission ordered incremental electric system reliability procurement by certain load serving entities ("LSE") to meet system resource adequacy ("RA") needs for the period 2021-2023. Under that Decision, PG&E is responsible for 716.9 MWs for its bundled customers. The Commission provided LSEs the ability to opt out of reliability

22/ D. 20-08-043, p. 13.

23/ PG&E's non-vintaged subaccount was established by Advice 5852-E.

24/ D. 22-02-002, p. 55, OP 9.

procurement, with IOUs procuring additional capacity associated with such opt-out amounts.[25/] The Commission adopted a modified Cost Allocation Mechanism ("Modified CAM"), for cost recovery from non-IOU LSEs that elected not to procure, and deferred cost recovery implementation details to a future stakeholder process.[26/]

On April 15, 2020, the Commission issued a ruling in R. 16-02-007 informing PG&E that it must procure 48.2 MWs of system RA resources for LSEs that opted-out of voluntarily self-providing their required portion.[27/] In Advice 5826-E, dated May 18, 2020, PG&E presented certain system reliability contracts for Commission approval, and proposed that bundled customer costs be recovered through the generation rate until the Modified CAM or other cost recovery mechanism is approved by the Commission. In 2021, by D. 21-06-035 in the Integrated Resource Plan proceeding, PG&E was ordered to acquire 2,302 MW of system resource adequacy by 2026 for its bundled portfolio

On May 23, 2022, the Commission issued a D. 22-05-015, adopting a Modified CAM mechanism to address the costs of electric resource procurement obligations mandated in D. 19-11-016 and D. 21-06-035. .In Chapter 6, PG&E presents costs resulting from D. 21-06-035. In Chapter 12, PG&E presents forecast 2023 Modified CAM costs. Consistent with its Advice 5826-E request, PG&E includes bundled customer procurement in its bundled customer ERRA revenue requirement and rate request. PG&E's Fall Update will reflect any updated cost recovery directives from D. 22-05-015 relevant to PG&E's procurement costs arising from D. 19-11-016 and D. 21-06-035.

25/ D. 19-11-016, pp. 74-75, COL 13.

26/ D. 19-11-016, pp. 74-75, COL 13.

27/ R. 16-02-007, *Administrative Law Judge's Ruling Finalizing Load Forecasts and Greenhouse Gas Benchmarks for Individual 2020 Integrated Resource Plan Filing and Assigning Procurement Obligations Pursuant to Decision 19-11-016* (Apr. 15, 2020) p. 9 (requiring PG&E to procure 48.2 MW consistent with the structure of D. 19-11-016).

2. Central Procurement Entity

On June 11, 2020, the Commission approved D. 20-06-002, adopting implementation details for a central procurement entity for multi-year local resource adequacy procurement beginning in 2023. Pursuant to that Decision, PG&E is designated to be the central procurement entity ("CPE") in its distribution service area. D. 20-06-002 established that administrative and procurement costs incurred by PG&E as a central procurement entity are recoverable under the CAM.[28/]

D. 22-03-034 addressed modifications to the CPE structure, including clarification concerning CPE cost recovery, ratemaking, and confidentiality matters associated with CPE procurement. Pursuant to that Decision, CPE "procurement costs [are to] be forecasted and implemented in rates through the annual [ERRA] forecast proceeding."[29/] The Decision further clarified that "CPE procurement costs shall be handled in a separate confidential chapter in ERRA forecast testimony, whereby the confidential contents shall only be viewable to the [IOU] CPE's personnel and support personnel, including staff such as contract management, law and regulatory compliance staff."[30/] In addition, the Decision adopted requirements concerning workpapers required to support the ratemaking requests in ERRA forecast applications, and directed specific ratemaking requirements for categories of CPE transactions .[31/] In Chapter 8, PG&E presents its forecasted administrative costs and forecasted procurement costs associated with PG&E's 2023 CPE activities. Consistent with D. 22-03-034, the confidential components of PG&E's CPE testimony and workpapers are only viewable to PG&E's CPE's personnel and support personnel. PG&E anticipates that its Fall Update will include updated CPE procurement transactions impactful to PG&E's ERRA forecast request.

28/ D. 20-06-002, p. 90, COL 17.

29/ D. 22-03-034, p. 78, OP 19.

30/ D. 22-03-034, p. 78, OP 19. See also D. 22-03-034, p. 78, OP 18 (adopting a confidentiality matrix applicable to CPE procurement-related information).

31/ D. 22-03-034, p. 78, OP 19 and pp. 78-79, OP 20.

3. PCIA Portfolio Optimization

In R. 17-06-026, the Commission considered matters related to portfolio optimization and cost reduction of the IOUs' PCIA-eligible portfolios. Ultimately, D. 21-05-030 adopted a Voluntary Allocation and Market Offer ("VAMO") process for each IOU's Renewables Portfolio Standard ("RPS")-eligible resources eligible for PCIA cost recovery to commence in January 2023.[32/] Voluntary Allocation is a process for the IOUs to allocate a "slice" of its PCIA-eligible RPS portfolio to eligible load serving entities in proportion to their vintaged, forecasted annual load share.[33/] Market Offer is a process for the IOUs to offer for sale RPS-eligible resources remaining following the Voluntary Allocation.[34/] In addition to VAMO, D. 21-05-030 ordered IOUs to hold Requests for Information to further PCIA portfolio optimization and cost reduction.[35/] D. 21-05-030 addressed ratemaking requirements relevant to Voluntary Allocation and authorized IOUs to track the incremental staffing and systems costs of administering the VAMO through a memorandum account, and to pursue recovery of these costs through the PABA in their individual ERRA forecast applications.[36/] Ratemaking requirements relevant to Market Offer transactions, together with other VAMO implementation matters, is under active consideration by the Commission in R. 18-07-003, the Commission's docket overseeing administration of the RPS program.[37/] PG&E anticipates that its Fall Update may incorporate any timely Commission Decisions relevant to VAMO that are adopted in R. 18-07-003.

32/ D. 21-05-030, pp. 63-64, OP 2 (ordering Voluntary Allocation); p. 64, OP 3 (ordering Market Offer); and pp. 65-66, OP 6 (establishing 2023 deliveries under VAMO framework). In PG&E Advice 6305-E, PG&E, together with the SCE and SDG&E, proposed a Voluntary Allocation methodology in compliance OP 7 of D. 21-05-030. The proposed Voluntary Allocation methodology was approved by Energy Division on October 25, 2021.

33/ D. 21-05-030, pp. 63-64, OP 2.

34/ D. 21-05-030, p. 64, OP 3.

35/ D. 21-05-030, pp. 65-66, OP 6.

36/ D. 21-05-030, p. 65, OP 5 and p. 66, OP 8.

37/ D. 21-05-030, p. 65, OP 5. D. 21-05-030 delegates certain implementation matters relevant to VAMO to R. 18-07-003. See D. 21-05-030, pp. 23 -24, 32, 35-39.

a. **VAMOMA**

On July 29, 2021 PG&E filed Advice Letter 6275-E requesting approval to establish the VAMOMA to track and record the incremental costs associated with administering the RPS VAMO process. On August 27, 2021, Energy Division accepted the tariff revisions proposed in Advice 6275-E. PG&E presents implementation activities and data supporting forecast 2023 VAMO activities, including detail supporting its request for disposition of recorded VAMOMA costs to PABA in Chapter 9.

b. **Minimum Retained RPS**

As anticipated by the Commission in D. 21-05-030, the implementation of VAMO is forecast to remove excess procurement from PG&E's RPS position.[38/] Indeed, as detailed in Chapter 9 and 11, PG&E forecasts that Commission-ordered VAMO programs will eliminate excess RPS from PG&E's bundled customer portfolio on an annual basis in 2023. Critically, the removal of departing load LSEs' vintage load share of PG&E's RPS volumes will leave PG&E bundled customers with insufficient volumes of 2023 RPS generation to meet the annual 2023 RPS target. Full utilization of forecast 2023 deliveries towards PG&E's 2023 RPS target is an impossibility because D. 21-05-030 orders volumes necessary to meet the 2023 RPS target with current year generation to be offered to departing load through Voluntary Allocation, and, if not accepted, such volumes are to be sold through Market Offer.

In D. 20-02-047, the Commission established that the annual RPS target quantities are appropriate minimum quantities for PG&E to consider for its annual retained RPS volumes as part of the PABA true up.[39/] Because implementation of Commission ordered portfolio optimization is forecast to leave PG&E bundled customers without adequate 2023 RPS deliveries to meet the 2023 RPS target, this Application must address the inclusion of pre-2023 RPS

38/ D. 21-05-030, p. 33 (observing "that the amount of excess RPS resources [would] decline precipitously" in coming years).

39/ D. 20-02-047, p. 13-14. This minimum retained amount was reinforced in D. 20-12-012 stating, "[t]hus, the Decision merely stated that PG&E should procure 'no less than,' i.e., a minimum of 31 percent of retail sales by 2019. (D. 20-02-047 p. 13.) PG&E fails to show how this conclusion is either unlawful or incorrect." D. 20-12-012, p. 5.

generation toward meeting PG&E's annual retained RPS volumes as part of its 2023 PCIA revenue requirement proposal.

In Chapter 11, PG&E addresses a proposal to include of 2021 and 2022 RECs to meet the annual minimum retained RPS quantity for bundled customer RPS compliance in 2023. PG&E presents a methodology to apply RECs from 2021 and 2022 generation for PG&E's bundled customers to meet PG&E's 2023 annual minimum retained RPS requirement consistent with RPS compliance rules. PG&E also proposes to credit the applicable PABA vintage subaccounts for the value of such prior years' RECs. PG&E's proposal will benefit customers responsible for applicable PABA vintage costs associated with those RECs through reducing the costs of PABA corresponding to the value of such utilized RECs.

4. PCIA Data-Related Matters

PG&E's recent ERRA forecast decisions established requirements concerning the data PG&E is required to produce in support of this Application. First, PG&E is obligated to provide certain information to parties to this proceeding as part of a response to Master Data Request in each of its future ERRA forecast proceedings.[40/] D. 20-12-038 establishes certain requirements for the exchange of confidential and public information relevant to PG&E's monthly ERRA/PABA/PUBA reports.[41/] Next, D. 22-02-002 expanded the Master Data Request to include the confidential workpapers supporting the Power Charge Indifference Adjustment rates from the prior year's ERRA Forecast proceeding.[42/] While the Master Data Request was expanded to include prior year workpapers, the Commission clarified that this proceeding will not revisit the prior year's PCIA rates.[43/] PG&E will make materials relevant to the Master Data Request available to parties to this proceeding consistent with the requirements of D. 20-12-038 and D. 22-02-002.

40/ D. 20-12-038, p. 38,-COL 11 through 14 and pp. 39-40, OP 4.

41/ D. 20-12-038, p. 38,-COL 11 through 14 and pp. 39-40, OP 4.

42/ D. 22-02-002, p. 54, OP 7.

43/ D. 22-02-002, p. 54, OP 7.

In addition, D. 22-01-023, among other things, established a process to address CCA concerns related to the IOUs' different confidentiality treatment of procurement related components of their respective ERRA forecast applications. The IOUs were directed to host a meet and confer with parties to their 2022 ERRA forecast proceedings to discuss the application of Decision 06-06-066 to ERRA and PABA data, and to propose changes to the public or confidential designations of data in its 2023 ERRA forecast application.[44/] On April 18, 2022, the IOUs hosted a telephonic meet-and-confer with parties to their respective 2022 ERRA forecast Applications (A. 21-04-010, A. 21-06-001, and A. 21-06-003). In that meet-and-confer, PG&E addressed concerns raised by CCA parties in Rulemaking 17-06-026 regarding PG&E's confidential treatment of certain granular attributes of RA products contained within PG&E's PCIA workpapers supporting this Application. At the meet-and-confer, PG&E indicated that such redactions were previously determined necessary to protect market-sensitive information pertaining to PG&E's bundled customer open position and sales strategies, and committed to further review.

Following the meet-and-confer, PG&E reviewed the redacted data in its PCIA workpapers and determined that confidentiality protections must continue to apply to the RA information to avoid bundled customer and broader market harm because, if publicly revealed, market sensitive information concerning its bundled customer open capacity position would be released.[45/] Further, absent such redactions, to protect PG&E's bundled customer open capacity position PG&E would redact components Commission's approved PCIA Workpaper Template. Because redactions to the PCIA Workpaper template are inconsistent with the Commission's goal of transparency in adopting the PCIA Workpaper Template, PG&E determined that it will

44/ D. 22-01-023, p. 27, COL 9 and p. 29, OP 7.

45/ PG&E's open position for capacity was determined by the Commission to be market-sensitive in D. 06-06-066. See D. 06-06-006, Appendix 1, Confidentiality Matrix, p. 13, Section VI.A (clarifying that utility bundled net open capacity position is confidential for three years).

continue to pursue confidentiality protections available to it under D. 06-06-066 and redact data necessary to protect its bundled customer's open position for RA capacity.[46/]

E. GHG Revenue Return Forecast, Administrative, and Program Costs

The return of GHG allowance revenues to customers and the administrative and outreach costs associated with the allowance revenue return have been the subject of several proceedings at the Commission, including R. 11-03-012, A. 14-05-025, and R. 20-05-002. In October 2014, the Commission issued a decision directing that recorded (actual) administrative and outreach expenses be reviewed for reasonableness in ERRA proceedings.[47/] Consistent with this direction, PG&E is including in this Application its 2021 recorded administrative and outreach expenses for the GHG program to be reconciled with the previously approved 2021 forecast. PG&E is requesting that the Commission review these expenses for reasonableness.

The Commission also directed that PG&E's ERRA Forecast application include forecasts for administrative and outreach expenses, GHG allowance revenue return amount, and Climate Credit amounts.[48/] Pursuant to D. 17-12-022, D. 18-06-027, and D. 20-04-012, PG&E sets aside proceeds from the sale of GHG allowances to fund, in whole or in part, four Disadvantaged Community Solar Programs (collectively, "Customer Generation Programs").[49/] Additionally, PG&E's electric GHG proceeds are also set aside to fund certain CCA Customer Generation Programs. In resolving PG&E's 2021 ERRA Forecast proceeding, D. 20-12-038 established that PG&E is to set aside funds associated with CCA programs pending Commission approval.[50/]

46/ See D. 17-08-026, p. 4, Finding of Fact (FoF) 2 and 3 (describing transparency goals in developing the template). The PCIA Workpaper Template was updated in D. 21-03-051 to address an error.

47/ D. 14-10-033, pp. 26, 35.

48/ D. 14-10-033, pp. 30-31.

49/ D. 17-12-022, p. 69, OP 4 (ordering reservation of GHG allowance proceeds in its ERRA proceeding to fund the Solar on Multi-Family Affordable Housing (SOMAH) Program); D. 18-06-027, pp. 103-104, OP 14 (ordering PG&E to fund disadvantaged community solar programs first through GHG allowance funds); D. 20-04-012, p. 14, OP 6 (ordering PG&E to propose SOMAH funding in its ERRA Forecast proceedings through 2026).

50/ D. 20-12-038, p. 36, COL 3.

Consistent with this direction, PG&E includes amounts associated with pending CCA Advice Letter requests as part of its funding requests presented in this Application. In Chapter 20, PG&E presents its set-aside proposals and a forecast of Customer Generation Programs funded through GHG allowance proceeds, including CCA programs.[51/] PG&E requests the Commission adopt the Customer Generation Program forecasts. PG&E's Fall Update will address any updated information, including true-up information, as part of its Customer Generation Program requests.

PG&E also includes in this Application its forecasts for administrative and outreach expenses, GHG allowance revenue return amount, and proposed California Climate Credit amounts for 2023. In D. 21-08-026, the Commission modified California Climate Credit to extend the same flat credit applied to residential customers to eligible small business customers.[52/] Therefore the California Climate Credit presented in this Application pertains to both residential and eligible small business customers. PG&E requests that the Commission adopt these forecasts in this proceeding.

Finally, in D. 15-12-022, the Commission clarified that in future ERRA Forecast proceedings, PG&E should use the public GHG allowance proxy price to calculate the residential California Climate Credit.[53/] Therefore, in this Application, PG&E is requesting approval of the California Climate Credit based on a calculation that uses the public proxy price.

F. Load Forecast Information

In D. 14-12-053, the Commission approved a stipulation between PG&E, the Agricultural Energy Consumers Association, and the California Farm Bureau Federation.[54/] In the stipulation, PG&E agreed to include a summary description of agricultural sales forecast

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51/ These programs are (1) SOMAH; (2) Disadvantaged Community Single Family Affordable Solar Housing (DAC SASH); (3) Disadvantaged Community Green Tariff (DAC-GT); and (4) Community Solar Green Tariff (CS-GT).

52/ D. 21-08-026, p. 60, COL 1; p. 61, COL 13; p. 64, OP 7.

53/ D. 15-12-022, pp. 12-13.

54/ D. 14-12-053, Attachment A.

information in its testimony, and more detailed information regarding agricultural sales in its workpapers. Chapter 2 of PG&E's Prepared Testimony includes a summary description of PG&E's agricultural sales forecast, and PG&E's workpapers include the more detailed agricultural sales information required by the stipulation.

In its decision approving PG&E's 2017 ERRA Forecast (D. 16-12-038), the Commission approved a proposal made by PG&E for future ERRA Forecast proceedings regarding the exchange of load forecasts with individual CCAs.[55/] Additionally, in Phase 2 of the PCIA OIR, the Commission ordered PG&E to report in its ERRA Forecast testimony details concerning its meet-and-confer activities and information exchange with CCAs in PG&E's service territory [56/] Similarly, D. 19-06-026 established a requirement that PG&E is to meet-and-confer with Electric Service Providers ("ESPs") that anticipate serving load concerning load migration forecast adjustments.[57/] Details concerning PG&E's meet-and-confer activities and information exchange with CCAs and ESPs concerning departing load forecasts are further described in Chapter 2 of PG&E's Prepared Testimony.

In the 2017 ERRA Forecast proceeding, PG&E entered into a stipulation with the Office of Ratepayer Advocates, now known as the Public Advocates Office or "CalPA", regarding specific load-related information to be included in workpapers and testimony in future ERRA Forecast proceedings, as well as meeting with the Public Advocates Office after the filing of the Application.[58] The information agreed to is provided in Chapter 2 of PG&E's Prepared Testimony and/or the workpapers for Chapter 2, and PG&E will schedule a meeting with CalPA at CalPA's earliest convenience.

55/ D. 16-12-038, p. 22, OP 3.

56/ D. 20-03-019, p. 29, OP 1.

57/ D. 19-06-026, p. 63, OP 14.

58/ A.16-06-003, Opening Brief of Pacific Gas and Electric Company (Sept. 27, 2016) Attachment A.

III. DESCRIPTION OF PG&E'S REQUESTS IN THIS APPLICATION

A. ERRA and Other Energy Procurement Rate Requests

The ERRA records market-based energy procurement costs associated with serving bundled customers.[59/] These costs include contracted resource costs, fuel costs for PG&E-owned and contracted generation, Qualifying Facility ("QF") and purchased power costs, and other electric procurement costs such as natural gas hedging and collateral costs and certain GHG compliance costs associated with the Assembly Bill ("AB") 32 cap-and-trade program. PG&E also proposes that the ERRA revenue requirement recover bundled customer costs associated with procurement required by D. 19-11-016, described in Section II above.

The Ongoing Competition Transition Charge ("CTC") forecast revenue requirement consists of the above-market costs associated with eligible contracts entered into before December 20, 1995, and QF contract restructuring costs. Ongoing CTC costs are recorded in the MTCBA.

Related to the Ongoing CTC is the PCIA, which is applicable to departing load customers that are responsible for a share of PG&E's utility owned generation ("UOG") and contracted generation resource commitments. The PCIA is intended to ensure that PG&E's bundled and departing load customers pay their share of the above-market portion of UOG and contracted generation resource costs, and that bundled customers remain indifferent to customer departures.

As described above, PG&E's PABA records net above-market costs for PCIA-eligible resources from both bundled and departing load customers. PABA balances are recovered from departed load customers through PCIA rates and are recovered from bundled customers through generation rates.

The Cost Allocation Mechanism ("CAM") was originally authorized in D. 06-07-029, and the methodology by which it was to be calculated was determined by D. 07-09-044 which

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59/ As used herein, the "ERRA-Main" refers to the recording of power costs associated with PG&E's BPP, as codified in Section 454.5(d)(3). Power costs recorded in ERRA are recovered solely from PG&E's bundled customer rates.

approved specific guidelines to be used to develop the CAM revenue requirement and resulting rate, and provides for a true-up of this rate to actual costs.[60/] Under the CAM, certain costs and benefits are allocated among all load serving entities in a utility's service territory. The CAM charge was first included in forecast year 2012, as a result of a settlement agreement on outstanding policy issues related to QF and Combined Heat and Power ("CHP") generation. The CAM revenue requirement sets rates for the New System Generation Charge ("NSGC"). CAM-eligible balances are recovered through the New System Generation Rate Balancing Account ("NSGBA").

The CAM is recovered through the New System Generation Rate Balancing Account ("NSGBA"). As described above, in D. 20-06-002, established that, beginning in 2023, PG&E is CPE in its distribution service area for local resource adequacy and the NSGBA will recover CAM-eligible CPE administrative and procurement costs.

The TMNBCBA was authorized in D. 18-12-003 to record the tree mortality related procurement costs incurred as directed by Resolution E-4770 and Resolution E-4805. TMNBCBA costs are non-bypassable and are recovered through the PPP charge.

As described above, D. 20-08-042 established that BioMAT contracts are recovered through the PPP charge. PG&E filed Advice Letter 5966-E to recover BioMAT contracts through the BioMAT Non-bypassable Charge Balancing Account subaccount in the PPP. As further described above, D. 22-02-022 authorized PG&E to recover costs associated with new PURPA contracts through a newly created subaccount in the Public Policy Charge Balancing Account. PG&E filed Advice 6524-E seeking tariff revisions to recover new PURPA contract costs through the Public Policy Charge Procurement ("PPCP") subaccount in the PPP.

The PUBA was authorized in D. 18-10-019 to record the shortfall in revenues accruing from departing load customers when the PCIA cap is reached. The PCIA cap was eliminated by D. 21-05-030. The PUBA trigger mechanism required PG&E to file an expedited application to

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60/ The CAM was modified by the Commission in D. 11-05-005.

change the PCIA rates to bring the PUBA balance down to below 7 percent if the under-collection reached 7 percent and was forecast to reach 10 percent.

Finally, as described herein, PG&E's revenue requirement requests include the (a) disposition of PG&E's forecast December 31, 2022 year-end balancing account balances; (b) disposition of recorded VAMOMA balances; and (c) application of PG&E's methodology to include 2021 and 2022 RECs toward the 2023 PCIA revenue requirement calculation and to allocate the value of such RECs to PCIA vintages to benefit customers responsible for applicable PABA vintage costs. Accordingly, PG&E requests that the Commission adopt its 2023 ERRA revenue requirements in this Application of $1,952 million and revenue requirements of $4,486 million for 2023 ratesetting purposes:

	2023 Revenue Requirement	**Amount (in thousands)**
1	CAM/NSGC	$155,432
2	VAMOMA	90
3	PCIA	1,037,672
4	Ongoing CTC	13,927
5	ERRA-Main	3,227,431
6	ERRA-PFS	(80,025)
7	PUBA	93,402
8	PPCP	(6,660)
9	TMNBC	26,445
10	BioMAT	18,636
11	Total Revenue Requirement for Rate-setting	$4,486,350
12	Adjustments for Revenue Requirements Authorized in Other Proceedings	
13	UOG-Related Costs	$(2,372,970)

	2023 Revenue Requirement	Amount (in thousands)
14	ERRA – PFS	80,025
15	2020 PUBA	(93,402)
16	RTBA-E	(143,833)
17	RUBA-E	(3,721)
18	Total Adjustments	($2,533,902)
19	**PG&E's Revenue Requirement Request in this Application**	$1,952,448

Consistent with past ERRA forecast proceedings, PG&E will update its 2023 forecast revenue requirements during the course of this proceeding to reflect market conditions close to the time when 2023 rates go into effect. PG&E's Fall Update will also include updated forecast balancing account balances, and will incorporate any final Commission decisions concerning relevant revenue requirements and the disposition of any balancing account balances. The approved amounts will be consolidated with other approved electric revenue requirements and rate changes through the Annual Electric True-up ("AET") process.

B. 2023 Electric Sales Forecast

PG&E requests that the Commission approve PG&E's electric sales forecast for 2023.

C. GHG Request

The California Air Resources Board ("ARB") allocates GHG allowances to the California IOUs on behalf of IOU customers:

> The utilities act as an intermediary by holding and then selling the allowances for ratepayer benefit; ARB prohibits the electric utilities from using the allowances for their own compliance obligation or their own benefit. The revenue from the sale of these GHG allowances is then returned to ratepayers and helps offset the increases in electricity costs that result from GHG compliance.[61/]

61/ D. 14-10-033, p. 5.

In the Prepared Testimony accompanying this Application, PG&E includes its forecast of 2023 GHG allowance revenues and the methodology that PG&E will use to allocate these revenues to its customers. PG&E also includes a forecast of Customer Generation Program costs, including: 1) the SOMAH Program, which was recently re-authorized in D. 20-04-012; and 2) the DAC-SASH, the DAC-GT, and the CSGT programs as ordered by D. 18-06-027, and includes set-aside requests for CCA Customer Generation Programs.

PG&E requests that the Commission adopt the following GHG-related forecasts for 2023:

	2023 GHG-Related Forecasts and Administrative, Program, and Outreach Expenses	**Amount**
1	GHG Administrative and Outreach Expenses	$737,000
2.	Customer Generation Programs	$64.4 million
3.	Net GHG revenue return	$536.7 million
4.	Semi-annual California Climate Credit	$42.58

PG&E will update these forecasts in its Fall Update, which is consistent with the Commission's direction in D. 14-10-033.[62]

PG&E also requests that the Commission find the 2021 recorded administrative and outreach expenses of $560,000 related to the 2021 GHG revenue return were reasonable.

IV. OVERVIEW OF PREPARED TESTIMONY

PG&E's Prepared Testimony accompanying this Application consists of one exhibit (PG&E-1) which includes the following chapters:

62/ D. 14-10-033, pp. 31-33 (describing GHG allowance revenue information to be updated in November Update).See also D. 22-01-023, p. 27, OP 2 (accelerating the November Update).

Chapter	Title
1	Introduction and Policy
2	Sales and Peak Demand Forecast
3	Generation Resource and Supply Cost Summary
4	Fuel Costs for Utility-Owned Generation Assets
5	Qualifying Facility and Other Legacy Purchased Power Agreement Costs
6	Procurement Costs: Post-2002 Contracted Resources
7	Hedging, Collateral, CAISO, and Other Costs
8	Central Procurement Entity Procurement Cost and Revenue Requirement Cost Allocation Mechanism
9	Voluntary Allocation and Market Offer and Request for Information Processes and Revenue Requirement
10	Cost Allocation Mechanism
11	Power Charge Indifference Adjustment and Ongoing Competition Transition Charge
12	Modified Cost Allocation Mechanism
13	Tree Mortality Revenue Requirements
14	Bioenergy Market Adjusting Tariff Revenue Requirement
15	Energy Resource Recovery Account
16	Green Tariff Shared Renewables
17	Balancing Account Forecasts
18	Greenhouse Gas Forecast Revenue and Reconciliation – Cost Calculations
19	Greenhouse Gas Forecast Revenue and Reconciliation – Administrative and Outreach Expenses
20	Greenhouse Gas Forecast Revenue and Reconciliation – Revenue Calculations Including Clean Energy and Energy Efficiency Programs
21	Energy Procurement Revenue Requirements
22	Rate Proposal

PG&E provides in Exhibit (PG&E-1) a public (redacted) version of its testimony, and provides to appropriate parties a confidential (unredacted) version (PG&E-1-C) which is submitted under Sections 454.5(g) and 583. PG&E is concurrently submitting declarations identifying the confidential material subject to protection under D. 06-06-066, D. 14-10-033 (which adopted confidentiality protections for GHG-related information), D. 21-11-029 (which modified confidentiality protections for certain RPS- related information); D. 22-03-034 (which adopted confidentiality protections for CPE-related information) and Section 454.5(g).[63/]

V. INFORMATION REQUIRED BY THE COMMISSION'S RULES OF PRACTICE AND PROCEDURE

A. Statutory and Other Authority (Rule 2.1)

PG&E files this Application pursuant to Sections 451, 454, 454.5, and 701, the Commission's Rules of Practice and Procedure, and prior decisions, orders and resolutions of the Commission, including but not limited to Decisions 02-10-062, 02-12-074, 03-06-067, 03-06-076, 03-07-030, 04-01-050, 04-12-048, 05-01-031, 05-02-040, 06-07-030, 07-05-005, 07-12-052, 08-11-004, 12-01-033, 13-12-011, 14-10-033, 14-12-054, 15-12-022, 16-12-038, 28-10-019, 18-12-002, 19-02-023, 20-02-047, 20-12-038; D. 21-05-030; D. 21-08-026; D. 22-01-023; D. 22-02-002; and D. 22-03-034.

B. Legal Name and Principal Place of Business (Rule 2.1(a))

The legal name of the Applicant is Pacific Gas and Electric Company. PG&E is a corporation organized under the State of California. PG&E's principal place of business is 77 Beale Street, San Francisco, California 94105.

C. Correspondence and Communications (Rule 2.1(b))

All correspondence, communications, and service of papers regarding this Application should be directed to:

63/ This is consistent with the Commission's direction in D. 08-04-023.

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D. Categorization, Hearings, And Issues To Be Considered (Rule 2.1(c))

1. Proposed Categorization

PG&E proposes that this Application be categorized as a ratesetting proceeding within the meaning of Rule 1.3(g) of the Commission's Rules of Practice and Procedure.

2. Need for Hearings

The need for hearings in this proceeding, and the issues to be considered in such hearings, will depend in part on the degree to which other parties contest PG&E's requests. The need for hearings will be determined by the assigned Administrative Law Judge(s). PG&E's proposed schedule assumes that hearings may be necessary.

3. Issues to Be Considered

The issues presented in this 2023 ERRA Forecast Application are as follows:

1. Should the Commission adopt PG&E's request to approve 2023 ERRA forecast revenue requirements in this Application of $1,952 million and revenue requirements of $4,486 million for 2023 ratesetting purposesall as initially forecast herein and as may be updated through the course of this proceding including (a) disposition of PG&E's forecast December 31, 2022 year-end balancing account balances; (b) disposition of recorded VAMOMA balances; and (c) the application of PG&E's methodology to include 2021 and 2022 RECs toward the 2023 PCIA revenue requirement calculation and to allocate the value of pre-2023 RECs to benefit customers responsible for applicable PABA vintage costs;

2. Should the Commission adopt PG&E's 2023 electric sales forecast?

3. Should the Commission adopt the following GHG-related forecasts for 2023?

	2023 GHG-Related Forecasts and Administrative, Program, and Outreach Expenses	Amount
1	GHG Administrative and Outreach Expenses	$737,000
2.	Customer Generation Programs	$64.4 million
3.	Net GHG revenue return	$536.7 million
4.	Semi-annual California Climate Credit	$42.58

4. Were PG&E's recorded 2021 administrative and outreach expenses of $560,000 reasonable?

5. Should the Commission approve PG&E's rate proposals associated with its proposed total electric procurement related revenue requirements, including its GTSR proposal, to be effective in rates on January 1, 2023?

E. Procedural Schedule (Rule 2.9)

PG&E proposes the scoping memo consider the following procedural schedule for this Application, with the submission of the proceeding to occur on November 10. 2022, with the filing of comments by parties on PG&E's Fall Update. Pursuant to Rule 2.9 (b), PG&E attaches its "Request for Expedited Schedule" as Attachment B.

Date	Event
May 31, 2022	PG&E files ERRA Forecast Application
June 2, 2022	Notice of Application appears in Daily Calendar
+ 30 days after Notice	Protests filed
+ 10 days after Protests/ Responses	Reply filed
By July 22, 2022[64/]	Prehearing Conference
September 7, 2022	Intervenor testimony served

64/ Rule 2.9 requires that in an expedited proceeding: a prehearing conference be noticed no later than 20 days from the date of preliminary categorization of the proceeding under Rule 7.1(a), and that a prehearing conference be held no later than 30 days from the date of preliminary categorization.

Date	Event
September 21, 2022	Rebuttal testimony served
September 24, 2022	Rule 13.9 Meet and Confer
September 27, 2022	Evidentiary Hearings (if needed)
October 7, 2022	Opening Briefs
October 17, 2022	Reply Briefs
October 24, 2022	Update to Prepared Testimony served
November 10, 2022	Comments to Fall Update served; proceeding submitted
November 2022	Proposed Decision
+ 5 days after Proposed Decision [65/]	Comments on Proposed Decision
+ 3 days after Comments on Proposed Decision	Reply Comments
By December 15, 2022	Final Decision

F. Articles of Incorporation (Rule 2.2)

PG&E is, and since October 10, 1905, has been, an operating public utility corporation organized under California law. It is engaged principally in the business of furnishing electric and gas services in California. A certified copy of PG&E's Amended and Restated Articles of Incorporation, effective June 22, 2020, was filed with the Commission on July 1, 2020, with PG&E's Application 20-07-002. These articles are incorporated herein by reference pursuant to Rule 2.2 of the Commission's rules.

G. Authority to Increase Rates (Rule 3.2)

PG&E is providing material in this Application that complies with Rule 3.2. This Application is not a general rate increase application, so Rule 3.2(a) may apply (depending on the Fall Update) except for subsections (4), (7), and (9).

H. Balance Sheet and Income Statement (Rule 3.2(a)(1))

PG&E's most recent balance sheet and income statement were filed with the Commission on May 2, 2022 in Application 22-05-002 and are incorporated herein by reference.

65/ Rule 14.6(b) allows the parties in the proceeding to stipulate to a shortened comment period. In the past, parties have stipulated to a shortened comment period given the timing constraints between the anticipated Proposed Decision date and the need for a January rate change.

I. Statement of Presently Effective Rates (Rule 3.2(a)(2))

PG&E's presently effective electric rates as of March 1, 2022, were filed with the Commission on March 11, 2022 in Application 22-03-010 and are incorporated herein by reference.

J. Statement of Proposed Increases or Changes In Rates (Rule 3.2(a)(3))

Exhibit A of this Application presents PG&E's proposed changes in electric rates.

K. Summary of Earnings (Rule 3.2(a)(5) and (a)(6))

A summary of recorded 2020 revenues, expenses, rate bases and rate of return for PG&E's Electric and Gas Departments was filed with the Commission on March 10, 2022 in amended Application 21-06-021 and is incorporated herein by reference.

L. Most Recent Proxy Statement – Rule 3.2(a)(8)

PG&E's most recent proxy statement dated April 7, 2022, was filed with the Commission on April 20, 2022 in Application 22-04-008 and is incorporated herein by reference.

M. Type of Rate Change Requested (Rule 3.2(a)(10))

The ERRA, Ongoing CTC, PCIA, TM NBC, CAM/NSGC, and PPP rate changes sought in this Application only pass through to customers electric procurement costs and ongoing electric industry restructuring-related transition costs, including non-bypassable charges. PG&E also requests approval of GTSR rates, which are also pass through to GTSR customers. With regard to GHG, this Application seeks to return to customers GHG allowance revenues. Thus, the GHG portion of this Application is not a rate increase.

N. Notice to Governmental Entities (Rule 3.2(b))

Exhibit B presents the list of governmental entities, including the State of California and cities and counties served by PG&E, to whom PG&E will mail a notice stating in general terms the proposed revenues, rate changes, and ratemaking mechanisms requested in this Application, within twenty days after filing this Application.

O. Publication (Rule 3.2(d))

Within twenty days after filing this Application, PG&E will publish in newspapers of general circulation in each county in its service territory a notice of filing.

P. Notice to Customers (Rule 3.2(d))

Within 45 days of filing this Application, PG&E will include notices with the regular bills mailed and emailed to all customers affected by the proposed changes.

Q. Safety (Rule 2.1(c))

In D. 16-01-017, the Commission adopted an amendment to Rule 2.1(c) requiring Applications to clearly state "relevant safety considerations." The Commission has previously explained that the "safe and reliable provision of utilities at predictable rates promotes public safety" and that review of the ERRA Forecast Application "ensures that utilities use reasonable assumptions in arriving at the forecast and provide rate certainty to bundled customers."[66/] As demonstrated in this Application and the Prepared Testimony, PG&E's forecasts in this proceeding are based on testimony regarding 2023 procurement-related costs and the return of GHG allowance revenues, and Commission-approved methodologies for certain non-bypassable charges. PG&E is providing detailed testimony and workpapers supporting all of its 2023 cost and retail sales forecasts, its revenue requirements and rate proposals, and its request to recover 2021 GHG-related administration and outreach costs. PG&E's proposals in this proceeding will promote the safe and reliable provision of electric service and establish predictable rates for 2023, all of which will facilitate public safety.

VI. SERVICE

This is a new application. No service list has been established. Accordingly, PG&E will electronically serve this Application, testimony, and related exhibits on parties to the service list for its 2022 ERRA Forecast Application (A. 21-06-001) and the ongoing PCIA Rulemaking, (R. 17-06-026). Electronic copies will also be served on Chief ALJ Anne Simon. Pursuant to the

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66/ D. 14-12-053 at p. 13 (PG&E's 2015 ERRA Forecast application).

Commission's COVID-19 Temporary Filing and Service Protocol for Formal Proceedings, paper copies of e-filed documents will not be mailed to the Administrative Law Judges or to parties on the service lists unless otherwise directed by the Commission.

VII. CONCLUSION

Wherefore, PG&E respectfully requests that the Commission issue an order in this ERRA Forecast Application to:

1. Adopt the following 2023 ERRA revenue requirements in this Application of $1,952 million and revenue requirements of $4,486 million for 2023 ratesetting purposes, including (a) disposition of PG&E's forecast December 31, 2022 year-end balancing account balances; (b) disposition of recorded VAMOMA balances; and (c) the application of PG&E's methodology to include 2021 and 2022 excess RECs toward the 2023 PCIA revenue requirement calculation and to allocate the value of such excess RECs to applicable PCIA vintages, all as initially forecast below and as may be updated through the course of this proceding, including in PG&E's Fall Update:

	2023 Revenue Requirement	Amount (in thousands)
1	CAM/NSGC	$155,432
2	VAMOMA	90
3	PCIA	1,037,672
4	Ongoing CTC	13,927
5	ERRA-Main	3,227,431
6	ERRA-PFS	(80,025)
7	PUBA	93,402
8	PPCP	(6,660)
9	TMNBC	26,445

	2023 Revenue Requirement	Amount (in thousands)
10	BioMAT	18,636
11	Total Revenue Requirement for Rate-setting	$4,486,350
12	Adjustments for Revenue Requirements Authorized in Other Proceedings	
13	UOG-Related Costs	$(2,372,970)
14	ERRA – PFS	80,025
15	2020 PUBA	(93,402)
16	RTBA-E	(143,833)
17	RUBA-E	(3,721)
18	Total Adjustments	($2,533,902)
19	**PG&E's Revenue Requirement Request in this Application**	$1,952,448

2. Adopt PG&E's forecast 2023 electric sales;

3. Adopt the following GHG-related revenue forecasts for 2023:

	2023 GHG-Related Forecasts and Administrative, Program, and Outreach Expenses	Amount
1.	GHG Administrative and Outreach Expenses	$737,000
2.	Customer Generation Programs	$64.4 million
3.	Net GHG revenue return	$536.7 million
4.	Semi-annual California Climate Credit	$42.58

4. Approve PG&E's recorded 2020 administrative and outreach expenses of $560,000 as reasonable;

5. Approve PG&E's rate proposals associated with its proposed total electric procurement-related revenue requirements, including PG&E's GTSR proposal, to be effective in rates on January 1, 2023; and

6. Grant such additional relief as the Commission may in its judgment deem proper.

Respectfully Submitted,

By *\/s/ Maria V. Wilson*
MARIA V. WILSON

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Attorney for
PACIFIC GAS AND ELECTRIC COMPANY

Dated: May 31, 2022

ATTACHMENT A
VERIFICATION

I, Fong Wan, say:

I am an officer of Pacific Gas and Electric Company, a corporation, and am authorized pursuant to Rule 2.1 and Rule 1.11 of the Rules of Practice and Procedure of the CPUC to make this Verification for and on behalf of said corporation, and I make this Verification for that reason. I have read the foregoing Application and I am informed and believe that the matters therein concerning Pacific Gas and Electric Company are true. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed at San Francisco, California, this 31st day of May 2022.

/s/ Fong Wan
FONG WAN
Senior Vice President, Energy Policy and Procurement

<u>ATTACHMENT B</u>
<u>REQUEST FOR EXPEDITED SCHEDULE</u>

PG&E respectfully requests that this *Application of Pacific Gas and Electric Company for Adoption of Electric Revenue Requirements and Rates Associated with its 2023 Energy Resource Recovery Account (ERRA) and Generation Non-Bypassable Charges Forecast and Greenhouse Gas Forecast Revenue Return and Reconciliation* be considered by the Commission on an expedited basis to avoid ratepayer harm and to comply with the requirements of Decision ("D.") 02-10-062 and to conform with Assembly Bill 57's statutory requirements.

In D. 02-10-062, the California Public Utilities Commission ("CPUC") established the ERRA balancing account – the power procurement balancing account required by Public Utilities Code Section 454.5(d)(3). The purpose of the ERRA balancing account is to provide California investor-owned utilities ("IOUs") with a mechanism for timely recovery of energy procurement costs, including expenses associated with fuel and purchased power, utility retained generation, California Independent System Operator related costs, and costs associated with the residual net short procurement requirements to serve their bundled electric service customers. In that Decision, Commission established an annual forecast process for fuel and purchased power forecasts and the ERRA mechanism, establishing a requirement for PG&E to file an Application on June 1 establish annual fuel and purchased power forecast, and true-up fuel and purchased costs. [67/]

The annual ERRA regulatory process consists, in relevant part, of an annual forecast proceeding to adopt a forecast of the utility's electric procurement cost revenue requirement and electricity sales for the upcoming year. The goal of the forecast case is to allow Decisions by the

67/ D. 02-10-062, p. 63, OP 14.

end of the year for recovery of procurement costs in rates. [68] Such an expedited cost recovery mechanism is necessary not only to protect ratepayers from financial harm, but to conform with Assembly Bill 57's statutory requirements. As the Commission stated, "[t]he purpose of balancing accounts and timely recovery of procurement costs are intertwined in the AB 57."[69] In addition, expedited approval is consistent with the directives of Public Utilities Code Section 454.5 (d)(3) to "[e]nsure timely recovery of prospective procurement costs incurred pursuant to an approved procurement plan."

PG&E's request is also consistent with D. 22-01-023, modifying multiple components of the annual ERRA forecast proceeding to ensure timely rate implementation.[70] Moreover, timely approval is necessary to ensure that PG&E's rates accurately recover forecast procurement costs from ratepayers. When approval of the forecast application is delayed, the forecasted procurement costs beginning on January 1 are recovered under rates set using the prior year's approved revenue requirement rather than rates that are intended to recover the procurement costs that are incurred beginning on January 1. Timely approval is essential to avoid a systemic mismatch in timing between the forecast period and the time at which the costs are recovered in rates as well as a mismatch between the procurement-related revenues and expenses.

68/ See D. 04-01-050, p. 177, footnote 2 (stating :the dates have been changed so the Investor-owned Utilities (IOUs) file earlier in the year. This will allow IOU/PUC to have decisions out by the end of the year.")

69/ Id. at p. 53.

70/ D. 22-01-023, FoF 4. See also D. 22-01-023, OPs 1-3 (accelerating ERRA forecast milestone dates).

EXHIBIT A

Revenue Increases and Class Average Rates

Table 1
Pacific Gas and Electric Company
Illustrative Electric Revenue Increase and Class Average Rates
Sunday, January 1, 2023

Line No.	Customer Class	Proposed Revenue Increase (000's)	Present Rates ($/kWh)	Proposed Rates ($/kWh)	Percentage Change	Line No.
	Bundled Service*					
1	Residential	$ (204,908)	$ 0.28549	$ 0.26642	-6.7%	1
2	Small Commercial	$ (65,542)	$ 0.31494	$ 0.29473	-6.4%	2
3	Medium Commercial	$ (59,141)	$ 0.29964	$ 0.27798	-7.2%	3
4	Large Commercial	$ (79,449)	$ 0.25824	$ 0.23800	-7.8%	4
5	Streetlights	$ (1,334)	$ 0.33742	$ 0.32183	-4.6%	5
6	Standby	$ (11,638)	$ 0.18375	$ 0.15204	-17.3%	6
7	Agriculture	$ (92,612)	$ 0.27496	$ 0.25603	-6.9%	7
8	Industrial	$ (64,887)	$ 0.19380	$ 0.17547	-9.5%	8
9	Total	$ (579,512)	$ 0.27256	$ 0.25294	-7.2%	9
	Direct Access and Community Choice Aggregation Service**					
10	Residential	$ (95,627)	$ 0.17948	$ 0.17391	-3.1%	10
11	Small Commercial	$ (27,083)	$ 0.19139	$ 0.18578	-2.9%	11
12	Medium Commercial	$ (30,358)	$ 0.15276	$ 0.14694	-3.8%	12
13	Large Commercial	$ (51,372)	$ 0.12055	$ 0.11559	-4.1%	13
14	Streetlights	$ (621)	$ 0.19185	$ 0.18746	-2.3%	14
15	Standby	$ (505)	$ 0.11783	$ 0.11024	-6.4%	15
16	Agriculture	$ (5,833)	$ 0.14649	$ 0.14183	-3.2%	16
17	Industrial	$ (38,862)	$ 0.07518	$ 0.07139	-5.0%	17
18	Total	$ (250,260)	$ 0.14287	$ 0.13779	-3.6%	18
	Departing Load***					
19	Residential	$ (2)			-0.4%	19
20	Small Commercial	$ (12)			-4.0%	20
21	Medium Commercial	$ (68)			-4.3%	21
22	Large Commercial	$ (112)			-5.7%	22
23	Streetlights	$ (0)			-8.4%	23
24	Standby	$ -			0.0%	24
25	Agriculture	$ (25)			-5.3%	25
26	Industrial	$ (1,382)			-4.7%	26

* Customers who receive electric generation as well as transmission and distribution service from PG&E.

** Customers who purchase energy from non-PG&E suppliers.

*** Customers who purchase their electricity from a non-utility supplier and receive transmission and distribution service from a publicly owned utility or municipality. A rate comparison cannot be provided for Departed Load as the applicable rates vary by specific departed load customer categories and any average rate that could be derived, would not be representative of any particular departed load category.

EXHIBIT B

Service of Notice of Application

SERVICE OF NOTICE OF APPLICATION

In accordance with Rule 3.2(b), Applicant will mail a notice to the following, stating in general terms its proposed change in rates.

State of California

To the Attorney General and the Department of General Services.

State of California
Office of Attorney General
1300 I St Ste 1101
Sacramento, CA 95814

and

Department of General Services
Office of Buildings & Grounds
505 Van Ness Avenue, Room 2012
San Francisco, CA 94102

Counties

To the County Counsel or District Attorney and the County Clerk in the following counties:

Alameda	Mariposa	Santa Clara
Alpine	Mendocino	Santa Cruz
Amador	Merced	Shasta
Butte	Modoc	Sierra
Calaveras	Monterey	Siskiyou
Colusa	Napa	Solano
Contra Costa	Nevada	Sonoma
El Dorado	Placer	Stanislaus
Fresno	Plumas	Sutter
Glenn	Sacramento	Tehama
Humboldt	San Benito	Trinity
Kern	San Bernardino	Tulare
Kings	San Francisco	Tuolumne
Lake	San Joaquin	Yolo
Lassen	San Luis Obispo	Yuba
Madera	San Mateo	
Marin	Santa Barbara	

Municipal Corporations

To the City Attorney and the City Clerk of the following municipal corporations:

Alameda
Albany
Amador City
American Canyon
Anderson
Angels Camp
Antioch
Arcata
Arroyo Grande
Arvin
Atascadero
Atherton
Atwater
Auburn
Avenal
Bakersfield
Barstow
Belmont
Belvedere
Benicia
Berkeley
Biggs
Blue Lake
Brentwood
Brisbane
Buellton
Burlingame
Calistoga
Campbell
Capitola
Carmel
Ceres
Chico
Chowchilla
Citrus Heights
Clayton
Clearlake
Cloverdale
Clovis
Coalinga
Colfax
Colma
Colusa
Concord
Corcoran
Corning
Corte Madera
Cotati
Cupertino
Daly City
Danville
Davis
Del Rey Oakes
Dinuba
Dixon
Dos Palos
Dublin
East Palo Alto
El Cerrito
Elk Grove
Emeryville
Escalon
Eureka
Fairfax
Fairfield
Ferndale
Firebaugh
Folsom
Fort Bragg
Fortuna
Foster City
Fowler
Fremont
Fresno
Galt
Gilroy
Gonzales
Grass Valley
Greenfield
Gridley
Grover Beach
Guadalupe
Gustine
Half Moon Bay
Hanford
Hayward
Healdsburg
Hercules
Hillsborough
Hollister
Hughson
Huron
Ione
Isleton
Jackson
Kerman
King City
Kingsburg
Lafayette
Lakeport
Larkspur
Lathrop
Lemoore
Lincoln
Live Oak
Livermore
Livingston
Lodi
Lompoc
Loomis
Los Altos
Los Altos Hills
Los Banos
Los Gatos
Madera
Manteca
Maricopa
Marina
Mariposa
Martinez
Marysville
McFarland
Mendota
Menlo Park
Merced
Mill Valley

Millbrae
Milpitas
Modesto
Monte Sereno
Monterey
Moraga
Morgan Hill
Morro Bay
Mountain View
Napa
Newark
Nevada City
Newman
Novato
Oakdale
Oakland
Oakley
Orange Cove
Orinda
Orland
Oroville
Pacific Grove
Pacifica
Palo Alto
Paradise
Parlier
Paso Robles
Patterson
Petaluma
Piedmont
Pinole
Pismo Beach
Pittsburg
Placerville
Pleasant Hill
Pleasanton
Plymouth
Point Arena
Portola
Portola Valley
Rancho Cordova
Red Bluff
Redding
Redwood City
Reedley
Richmond
Ridgecrest
Rio Dell
Rio Vista
Ripon
Riverbank
Rocklin
Rohnert Park
Roseville
Ross
Sacramento
Saint Helena
Salinas
San Anselmo
San Bruno
San Carlos
San Francisco
San Joaquin
San Jose
San Juan Bautista
San Leandro
San Luis Obispo
San Mateo
San Pablo
San Rafael
San Ramon
Sand City
Sanger
Santa Clara
Santa Cruz
Santa Maria
Santa Rosa
Saratoga
Sausalito
Scotts Valley
Seaside
Sebastopol
Selma
Shafter
Shasta Lake
Soledad
Solvang
Sonoma
Sonora
South San Francisco
Stockton
Suisun City
Sunnyvale
Sutter Creek
Taft
Tehama
Tiburon
Tracy
Trinidad
Turlock
Ukiah
Union City
Vacaville
Vallejo
Victorville
Walnut Creek
Wasco
Waterford
Watsonville
West Sacramento
Wheatland
Williams
Willits
Willows
Windsor
Winters
Woodland
Woodside
Yountville
Yuba City